

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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DOLORES BIGUS and RAYMOND BIGUS,

Plaintiffs,

Docket No.: 06 CV 1462
(ARR)

-against-

MARRIOTT HOTEL SERVICES, INC.,

**JOINT PROPOSED
VERDICT SHEET**

Defendant.
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**Your answers to the special questions submitted to you must be unanimous.
Unless all of you agree, you may not return an answer to any question.**

Question No. (1)

Do you find from a preponderance of the evidence that defendant Marriott Hotel Services was negligent in one or more of the specific acts alleged by plaintiffs?

YES _____ NO _____

If your answer to Question No. (1) is "Yes", proceed to Question No. (2)

Otherwise, report to the Court.

Question No. (2)

Do you find from a preponderance of the evidence that the negligence of defendant Marriott Hotel Services was the proximate cause of plaintiff's injuries?

YES _____ NO _____

If your answer to Question No. (2) is "Yes", proceed to Question No. (3)

Otherwise, report to the Court.

Question No. (3)

Do you find from a preponderance of the evidence that plaintiff was negligent in performing one or more of the specific acts alleged by defendant Marriott Hotel Services?

YES _____ NO _____

If your answer to Question No. (3) is "Yes", proceed to Question No. (4)

If your answer to Question No. (3) is "No", proceed to Question No. (6)

Question No. (4)

Do you find from a preponderance of the evidence that the negligence of plaintiff was a proximate cause of plaintiff's injuries?

YES _____ NO _____

If your answer to Question No. (4) is "Yes", proceed to Question No. (5)

Question No. (5)

What is the percentage of fault of:

Plaintiff _____%

Defendant _____%

TOTAL MUST BE 100%

Question No. (6)

What is the full dollar amount of damages sustained by the plaintiff, for physical pain and suffering, up to the date of your verdict?

Amount \$ _____

Question No. (7)

What is the full dollar amount of damages sustained by the plaintiff, for physical pain and suffering to be incurred in the future?

Also, if you make any award to compensate the plaintiff for damages to be incurred in the future, then you must state the period of years over which such amount is intended to provide compensation.

Amount \$ _____ Number of Years _____